

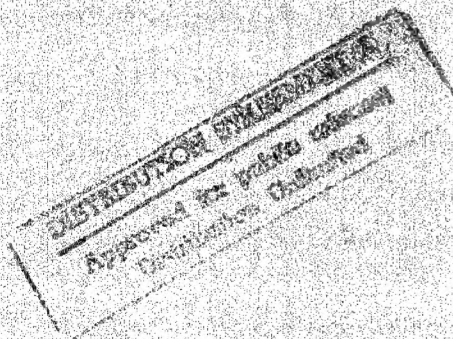
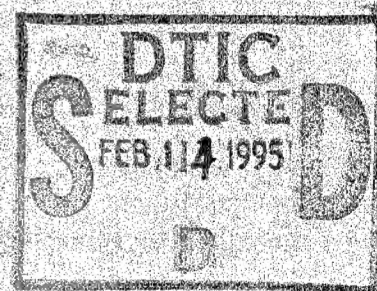
GAO

Report to the Chairman, Subcommittee on
Oversight and Investigations, Committee
on Energy and Commerce, House of
Representatives

March 1992

WORKPLACE ACCOMMODATION

EPA's Alternative Workspace Process Requires Greater Managerial Oversight



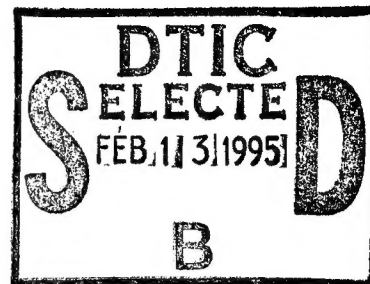
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General Government Division

B-246983

March 18, 1992

The Honorable John D. Dingell
Chairman, Subcommittee on Oversight
and Investigations
Committee on Energy and Commerce
House of Representatives



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Dear Mr. Chairman:

This letter responds to your request that we provide you with information concerning the U.S. Environmental Protection Agency's (EPA) decision to allow one of its headquarters employees to work in her home rather than in her assigned office workspace. This employee had sought an alternative work location owing to her belief that something present in her EPA office environment was causing her health problems. You also asked us for information about a grievance that this employee had filed relating to problems she reportedly experienced while working at home.

In the course of obtaining information on this specific employee's case, we noted that the internal controls on EPA's alternative workspace (AWS) approval process—of which authorization to work at home is a part—appeared to be weak. Accordingly, in concert with the accomplishment of our principal objectives, we assessed the adequacy of the internal controls in place for the AWS process. This work included a review of all AWS cases approved by EPA during the period from November 1988 through November 1991.

Results in Brief

EPA's AWS approval process, established in 1988, provides an administrative mechanism through which headquarters employees can obtain suitable alternative office workspace or, in some cases, permission to work in their own homes as an accommodation to their health problems.

The specific employee you asked about was one of the EPA headquarters employees who sought AWS through the established approval process for health-related reasons. After the employee reported health problems in her Waterside Mall office and in two alternative office work locations between July 1990 and November 1990, she was authorized to work at home beginning in December 1990. As of late February 1992, the employee was still working at home. Agency officials interviewed could not specify when the employee was expected to return to a regular office working environment.

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The grievance this employee filed in February 1991 concerned a variety of issues that arose while she was working at home. Principally, these issues involved the employee's expressed dissatisfaction with her work-at-home assignment; with her lack of access to certain work information, supplies, and computer equipment; and with her belief that she was being unfairly treated by agency management. The matter ended in May 1991 when the employee elected to withdraw her grievance.

According to agency officials, a total of 34 employees (including the above employee) received approval for AWS through the established agency process and began working in AWS during the period from November 1988 through November 1991. Of these 34 AWS employees, 18 employees were authorized to work in their own homes at some point during their AWS period. However, in addition to these 34 employees, agency officials identified 9 other employees as having been granted AWS by their supervisors during this time frame without having gone through the established AWS process.

EPA's internal controls over its AWS process need to be strengthened. Currently, the administration of the process is dispersed among several different offices and officials, with no one office or official providing overall managerial control or oversight. To ensure that the AWS process receives adequate overall managerial direction and supervision, authority and responsibility for administering AWS should be vested in a single agency office or official.

Additionally, an AWS case reevaluation procedure should be established and implemented. Because EPA does not currently have a reevaluation requirement, there is no way for EPA management to periodically take changes in AWS employees' health and/or improvements in their regularly assigned office workspaces into account in determining whether this special accommodation continues to be warranted.

We discussed these issues with EPA officials, and they agreed with our findings and recommendations.

Objectives, Scope, and Methodology

The objectives of our review were to obtain information on (1) the background and scope of EPA's AWS process, (2) the circumstances leading to EPA's decision to authorize the employee you asked about to work at home, and (3) the grievance the employee filed concerning problems she reportedly experienced while working at home. In the course of this work, we also assessed the adequacy of EPA's existing internal controls on AWS.

The scope of our work consisted of reviewing EPA's current AWS policies and practices as well as information on specific cases in which EPA had approved AWS (including work at home) as an employment-related accommodation to a health problem. We also discussed these issues with key EPA headquarters officials involved in administering the AWS process.

To obtain information on the workplace environment issues at EPA headquarters that led to EPA's establishment of the AWS process, we interviewed the current director of EPA's Safety, Health, and Environmental Management Division (SHEMD). We also obtained and reviewed EPA reports and other information on various indoor air quality studies and occupational health monitoring activities done at EPA headquarters since the agency began receiving reports of workplace-related employee health concerns.

To identify the policies and procedures that EPA management has implemented to accommodate specific workplace-related employee health needs, we interviewed a senior personnel official in EPA's Office of Human Resources Management (OHRM). To obtain additional information on the process that EPA employees follow to obtain approval for AWS, we interviewed the health and safety official who manages EPA's wellness program and who oversees EPA's Employee Health Unit (EHU) operations. We did this work in concert with our review of EPA's written AWS policies and procedures.

We also interviewed the current EHU physician, who provides medical services under a contract between EPA and a private medical firm, Occu-Health, Inc. We sought this physician's views because, under EPA's AWS procedure, he is responsible for determining whether there is evidence of a cause-and-effect relationship between an employee's health problems and conditions in that employee's office workspace. Additionally, we interviewed a facilities management official in EPA's Facilities Management and Services Division (FMSD) to obtain historical background information on the nature and frequency of the indoor air quality problems at EPA headquarters and the causes of those problems.

To determine the extent to which the AWS process (of which the work-at-home alternative is a part) has been used as a health-related accommodation by EPA, we obtained data from EPA officials on all AWS cases occurring in EPA during the period from November 1988 through November 1991. We selected this time period for examination because EPA had AWS data available for these years and because we concluded that a review of EPA's experiences over this period would provide an accurate picture of the AWS process in operation.

We attempted to independently determine the total number of employees in AWS and the processing histories of these AWS cases by auditing AWS records maintained by various officials involved in administering the AWS process. However, we could not do so because these AWS records were incomplete and frequently lacking in key details.

Because our work was limited to the above human resource management issues, we did not determine whether EPA headquarters actually has had specific indoor air quality or other facilities-related problems that caused employees to become ill, or whether EPA has been successful in remedying any such problems.

Our work, done between July 1991 and January 1992 at EPA headquarters in Washington, D.C., was in accordance with generally accepted government auditing standards.

EPA Has Established Procedures for Processing Employees' Health-Related AWS Requests

The Equal Employment Opportunity Commission (EEOC) has issued governmentwide regulations on the employment of handicapped persons in the federal service.¹ One of these regulations generally requires that federal agencies make reasonable, workplace-related accommodations to their employees' known physical limitations.² Examples of reasonable accommodations cited in the regulation include making workplace facilities readily accessible to handicapped persons, job restructuring, and part-time or modified work schedules.

An EPA official who played a key role in developing the AWS process told us EPA established its AWS policies and procedures in the Fall of 1988. The official said this was done after agency management received a succession

¹These regulations appear in 29 C.F.R. Part 1613, Subpart G.

²See 29 C.F.R. 1613.704.

of reports that EPA headquarters employees were becoming ill while working in the Waterside Mall complex in Southwest Washington, D.C.³ EPA's AWS policies and procedures allow employees so affected to request an alternative work location or work assignment away from their regular office environment as an accommodation to their health problems.

This official recounted that the AWS process was not the product of an agency task group, policy committee, or other formal agency body. Rather, the AWS policies and procedures evolved through a series of discussions between EPA's Assistant Administrator for Administration and Resources Management and representatives from EPA's personnel, health and safety, and facilities management staffs. The official added that once agreement had been reached among these officials as to how the AWS process should be structured, the procedures were worked out in concert with EPA's headquarters unions. Subsequently, the Assistant Administrator issued the agency's AWS policies and procedures in writing in July 1989.

EPA's AWS procedures state that when it is determined through the prescribed medical evaluation process that for health reasons an employee should not remain in his or her regularly assigned workspace, the employee's supervisor must determine whether the employee's work assignments are such that they can be accomplished at another location. If so, the employee's supervisor must try to find suitable AWS for the employee.⁴ Depending on the circumstances, this AWS can be (1) elsewhere in the same building, (2) in another building where EPA has available workspace, or (3) in the employee's own home. While EPA's AWS policy specifically mentions work at home as an available accommodation option, the policy does not explain in what specific circumstances work at home would be appropriate.⁵

³The Waterside Mall complex consists of approximately 800,000 square feet of office space in three buildings: the Main Mall, the East Tower, and the West Tower. As of November 1991, approximately 5,000 employees worked in this complex.

⁴The policy says that if the employee's duties are such that the employee cannot do his or her work from an alternative workspace, the employee should be reassigned to a new job if possible.

⁵These AWS procedures are separate from EPA's 1-year pilot "flexiplace" project, which was established under guidelines developed by the President's Council on Management Improvement. EPA's flexiplace project generally permits an employee to work from a location of choice other than his/her usual EPA office.

Some Employees Received AWS Without Going Through the Established AWS Process

At our request, agency officials provided data on each of their AWS cases. For accounting purposes, we operationally defined an "approved AWS case" as one in which an employee sought AWS through the AWS process between November 1988 and November 1991 owing to health problems believed to be related to workplace indoor air quality, received agency approval to enter AWS, and actually entered AWS. According to EPA officials, 34 headquarters employees were approved for and actually worked in AWS as a health-related accommodation between November 1988 and November 1991. Of these 34 AWS employees, 18 employees were authorized to work in their homes at some point during their AWS period.⁶ As discussed in more detail below, 1 of these 34 employees is the employee whose work-at-home situation you had asked about.

Agency officials also identified nine other headquarters employees who had been granted AWS during this same period without going through the established AWS process. The officials said that in each of these cases, the employee's own supervisors had unilaterally authorized AWS without requiring that the need for AWS first be medically established by the EHU physician. A personnel official with whom we discussed this situation agreed that these nine cases should have been evaluated by the EHU physician in accordance with the established AWS policy before AWS was granted.

Different Categories of Employees Received AWS

In reviewing the above AWS data, we noted that of the 43 headquarters employees in AWS, 30, or 70 percent, came from 4 specific occupational categories—attorneys, environmental protection specialists, program analysts, and environmental scientists. We also noted that 31 of the cases, or 72 percent, involved employees in pay grades 13 and 14. Two EPA organizations, the Office of Enforcement and the Office of Solid Waste and Emergency Response, employed 26, or 60 percent of the employees who were granted AWS. The remaining AWS cases involved employees in 11 other occupational categories, 6 other pay grades, and 9 other EPA organizations.

⁶In some instances, employees moved from one AWS location to another.

Information on a Specific AWS Case

According to the EPA officials we interviewed and documentary materials provided by the employee you asked about, the circumstances leading to the employee's work-at-home arrangement began in the Spring of 1990, while the employee was working at Waterside Mall.

In May 1990, EPA undertook "Operation Cleanup," an extensive indoor cleaning of the three office buildings in the Waterside Mall complex. A facilities management official explained that part of this process involved cleaning the ventilation system, including the air ducts and the plenum space (the open space between the ceiling tiles and the next floor, which functions as an air return passage). In the course of this cleaning, new office ceiling tiles were installed. This official recalled that in July 1990, the employee reported becoming ill from the smells of the newly installed ceiling tiles and a citrus-scented cleaner being used to clean the air ducts.⁷

Documentary materials provided by the employee show that in August 1990, citing health problems she was experiencing working in her Waterside Mall office space, the employee asked to be assigned AWS. In accordance with the agency's established AWS approval process, the employee was required to provide medical information documenting the health problem to support her AWS request.

These materials further show that the employee submitted some written medical information from her personal physician to EPA's EHU physician for evaluation. However, after reviewing this information, the EHU physician concluded that it was insufficient to enable him to medically establish the employee's need for AWS. The documents reflect that the employee was subsequently advised that additional medical information was needed, and the EHU physician offered his services to help provide this information. However, the employee refused the EHU physician's assistance. As a result, in August 1990, the employee's AWS request was disapproved due to inadequate supporting medical evidence. Subsequently, the employee submitted additional medical evidence, and her request for AWS was approved in late October 1990.

In early November 1990, the employee's organization relocated from Waterside Mall to office space on the eighth floor of a new building at Crystal Station in northern Virginia, and the employee began working in new office space at that time. However, according to documentary materials provided by the employee, she immediately reported

⁷The employee herself attributed her illness to indoor air contaminants (dust and/or vapors).

experiencing medical problems in her new office workspace. The employee attributed these problems to exposure to new materials in her office, such as the new carpeting and cloth partitions. As a result, the employee once again sought AWS.

The related documentation shows that on this occasion the employee supported her AWS request with medical information submitted, and an AWS eligibility determination made, while she was still working at Waterside Mall. Although by this time the employee had moved from Waterside Mall to Crystal Station, the EHU physician nevertheless recommended that the employee be assigned AWS.

In mid-November 1990, the employee was assigned office space on the second floor of the Crystal Station building, in what is called the "clean room." A facilities management official explained that the clean room is a special workspace area set up by EPA specifically for employees needing AWS for health reasons. This official added that special attention had been given to providing adequate ventilation and to excluding such items as carpeting and new furnishings that might adversely affect chemically sensitive employees. However, documents provided by the employee show that shortly after being assigned to work in the clean room, the employee reported becoming ill in this new office space.

At this point, the employee pressed for authorization to work at home. When the EHU physician, who evaluated the employee's request, again recommended AWS, the agency authorized the employee to work at home in December 1990. According to a personnel official, the employee was still working at home in late February 1992.

We discussed this employee's AWS case with the current EHU physician. This physician said he had never personally examined the employee for AWS entitlement purposes, noting that he did not begin work at EPA until May 1991, well after the employee received approval to work at home.

We asked this physician to evaluate the medical information contained in the employee's EHU medical records file.⁸ According to the physician, this information consisted of some documentary materials prepared by the employee's personal physicians, which had been submitted to the physician's EHU predecessor for AWS qualification purposes. After

⁸We did not personally review the contents of this employee's or any other EPA headquarters employee's EHU medical file.

evaluating these materials, the physician told us that the information of record was not, in his medical judgment, sufficient to support the employee's request for an AWS accommodation.

The physician explained that the medical information of record was purely narrative and was lacking in specific medical support (such as laboratory test results). He added that in the absence of adequate medical evidence, the benchmark requirements for a workplace accommodation were not, in his professional opinion, satisfied.

The physician told us in December 1991 that in the months since his arrival at EPA, neither the employee nor agency management officials had requested that he evaluate the employee's medical condition to determine whether the employee still needed to work at home. We also could not establish from the physician or from the agency officials we interviewed when the employee was expected to return to an office work environment.

The Employee's Grievance

You also asked us about a grievance that this same employee had filed concerning a variety of work-related problems the employee said she had been experiencing while working at home.

According to information provided by the employee and the management officials we interviewed, the employee first initiated this grievance with agency management in February 1991. The substance of the grievance involved, among other things, the employee's dissatisfaction with the nature of her work-at-home assignment; her lack of access to certain work information, supplies, and computer equipment comparable to the equipment provided to other employees; and her belief that she was being unfairly treated by certain management officials.

The grievance record documents that this matter had proceeded through successive stages of the established labor-management grievance procedure without resolution until May 1991, when the employee elected to withdraw her grievance. The employee explained that although she was still dissatisfied with her treatment by agency management officials, she had by this time virtually completed the work assignment on which her grievance had largely been based.

Internal Control Problems Exist With the Current AWS Process

Information we obtained on the 43 AWS cases discussed above and on the policies and procedures EPA has implemented to process employees' AWS requests showed that the internal controls established for the AWS process were insufficient to adequately safeguard the government's interests.

Adequate Internal Controls Are Required by Law

In accordance with the Federal Managers' Financial Integrity Act of 1982,⁹ GAO has published standards to be followed by executive agencies in establishing and maintaining systems of internal controls.¹⁰ A principal purpose of establishing internal controls is to safeguard government assets against waste, loss, unauthorized use, or misappropriation. Among other things, GAO's standards require that (1) internal control systems, individual transactions, and other significant events be clearly documented; and (2) qualified and continuous supervision be provided over program operations to ensure that internal control objectives are achieved.

Adequate Managerial Oversight Over the AWS Process Is Lacking

We found that responsibility for administering the AWS process was divided among officials in several different organizations, with no one official or organization providing overall managerial oversight or control.

According to information obtained from the EPA officials we interviewed and EPA's published AWS policies and procedures, responsibility for the AWS process was dispersed as follows:

- **Line supervisors** are responsible for (1) referring an employee's AWS request through the health and safety staff in SHEMD to the EHU physician for evaluation, (2) locating suitable AWS for the employee once it has been established that the employee's health needs require such an arrangement, and (3) providing whatever additional level of supervisory assistance and oversight may be needed while the employee is working in AWS.
- **Health and safety officials** in SHEMD are to (1) provide procedural advice to employees and supervisors on the requirements for processing AWS requests, (2) arrange for evaluations of individual employees' AWS requests by the EHU physician, and (3) investigate (and resolve if possible) attributes of an employee's workspace that may be causing an employee's medical problems.

⁹31 U.S.C. 3512(c).

¹⁰Standards For Internal Controls in the Federal Government (GAO, 1983).

- **The EHU physician** is to (1) evaluate an employee's medical symptoms on the basis of the physician's own medical examination and/or medical information provided by the employee's personal physician, and (2) determine whether there is evidence of a causal relationship between an existing medical problem and attributes of the employee's assigned workspace.
- **Personnel officials** in OHRM are to become involved in individual cases when an employee's job duties need to be modified or the employee needs to be reassigned to a wholly new job to accommodate the employee's health problem.
- **Facilities management** staff in FMSD are to help locate suitable AWS for employees whose AWS requests have been approved. This staff also works with safety and health officials to investigate and resolve facilities-related problems thought to be affecting employees' health or comfort.

Although the personnel, health and safety, EHU, and facilities management officials we interviewed all acknowledged their respective roles in the AWS process, none of these officials felt that his or her own organization had leadership responsibilities for, or ownership of, the AWS process. These officials also felt that they did not have authority to direct actions by officials charged with handling other parts of the process. As a result, although we found evidence of cooperative interaction between the various officials and offices involved in the AWS process, there was little evidence of directed management activity to monitor, assess, or improve the administration of the overall AWS process.

EPA Does Not Evaluate an Employee's Continued Need for AWS Once It Has Been Approved

EPA's current AWS policy does not require reevaluations of AWS employees' situations to determine whether continued AWS is still medically necessary or appropriate. Without a case review procedure, EPA has no way to periodically assess whether the state of an AWS employee's health and/or the conditions of his or her regular office working environment still necessitate the accommodation made.

A personnel official we interviewed said EPA believes it currently has authority under Office of Personnel Management (OPM) regulations in 5 C.F.R. Part 339 to ask AWS employees to undergo periodic reevaluations.¹¹ However, EPA's published AWS policies and procedures do not explicitly

¹¹ 5 C.F.R. Part 339 empowers agencies to seek medical information from an employee requesting an employment-related accommodation to a medical condition and enumerates the specific kinds of information to be provided.

require that an AWS decision be periodically updated or reevaluated once it has been made, and we found no evidence of ongoing, systematic efforts by EPA management to update AWS approval decisions.

AWS as an Accommodation Can Involve Benefits and Costs to the Agency

A health and safety official pointed out that there are benefits to EPA's use of AWS as a health-related accommodation. As one example, this official observed that granting AWS to an ill employee allows EPA to continue to receive the benefit of the employee's services. The official noted that these services might otherwise be lost to the agency were the employee's special health needs not accommodated. Additionally, the official observed that EPA's expressed willingness to accommodate ill employees through AWS is beneficial to morale in that it is seen by the agency's workforce as a compassionate response to employees' special needs.

However, while there are benefits, there are also tangible and intangible costs associated with AWS. For example, a personnel official explained that EPA's existing AWS procedures require that work-at-home agreements be developed and implemented by local management for AWS employees working at home. The official noted that these agreements, which cover such issues as how work will be assigned and how duty time will be reported, are time-consuming to prepare and to work with.

The official also pointed out that supervisors of AWS employees must spend proportionately more time individually communicating work instructions, providing guidance, receiving and returning work products, and identifying suitable work assignments for AWS employees. This official observed that such management functions can be more easily and quickly accomplished when employees and supervisors work in the same general office area. The official added that she also felt there was a loss of management control associated with AWS.

Finally, the official noted that there can also be additional, equipment-related costs involved with providing some AWS employees with such items as computers, facsimile machines, and additional telephone lines at their AWS/work-at-home locations.

Some Management Improvements Have Recently Been Made

While problems with the AWS process remain to be addressed, we did find evidence of recent management actions to strengthen and improve the administration of the process:

- The current EHU physician said he was taking steps to ensure that OPM's medical documentation requirements in 5 C.F.R. Part 339 were satisfied and that the requisite causal relationship between an employee's illness and his or her office environment was adequately established when the physician evaluated AWS requests. This physician noted that the EHU's medical records assembled by his predecessor often contained little or no information documenting employees' specific medical needs for AWS. EPA has also contracted for the services of a board-certified, Public Health Service occupational health physician to provide expert consultative advice and assistance to the EHU physician and the health and safety staff in dealing with workplace illness issues, including AWS matters.
- A personnel official told us that her staff had recently contacted the supervisors of all employees in AWS for the express purpose of obtaining current information on the status of each AWS case. The official said that prior to undertaking this effort, EPA management did not have current and complete information at hand on all of these cases. The official also said that a study of the AWS process by an in-house analyst or a contractor was currently under consideration by the agency. According to this official, no such study or evaluation has been done in the past. However, the official could not say when the study would actually be undertaken or what its specific objectives, scope, or methodology would be.
- A health and safety official said that a procedure to require employees in AWS to submit to periodic medical examinations for the purpose of reevaluating these employees' needs for continued health-related accommodations has been proposed and discussed. However, this official could not tell us when (or if) EPA actually planned to implement this requirement.

Conclusions

The EPA headquarters employee whose situation you asked about has been approved to work at home since December 1990 in accordance with an established AWS procedure. Under this procedure, headquarters employees experiencing health problems believed to be related to their office workspace can obtain agency approval to work at another physical location. In some situations, this can be in their own homes.

A grievance that this same EPA headquarters employee filed in February 1991 involving her work assignment and other matters of concern that

arose while she was working at home ended in May 1991 when the employee elected to withdraw her grievance.

EPA's internal controls over its AWS process were insufficient to ensure that the interests of the government were adequately safeguarded. Because various parts of EPA's existing AWS process were divided among different agency officials and offices, with no one official or office providing overall direction, the process lacked adequate managerial control or supervision. The effects of this lack of managerial control were evidenced by EPA's systems of AWS-related records, which we found to be in an incomplete and unauditible condition, and by the fact that 9 of the 43 AWS cases documented were not handled in accordance with EPA's established AWS approval process.

Additionally, the existing AWS process did not enable EPA to ensure that the need for employees to continue in AWS as a health-related accommodation was periodically evaluated. We believe that such a procedure is needed in order to take into account changes in AWS employees' health and/or improvements in their regular office working environments. Such changes, which can reasonably be expected to occur over time, can affect AWS employees' continuing needs for this special accommodation.

EPA management has recently taken some steps to improve the administration of its AWS process. However, we believe that greater overall managerial control over the AWS process is needed. In our view, this can best be accomplished by vesting a single agency office or official with the authority and the overall responsibility for developing and implementing agencywide AWS policies and procedures and for overall management of the AWS process. We also believe that management needs to ensure that AWS employees' continuing need for this special accommodation is periodically reevaluated.

Recommendation to the EPA Administrator

We recommend that EPA's Administrator direct the Assistant Administrator for Administration and Resources Management to strengthen managerial control and oversight over the AWS process by

- vesting a single EPA office or official with express authority and overall responsibility for developing and implementing agencywide AWS policies and procedures and for overall management of the AWS process; and
- developing and implementing an agencywide policy requiring that all current and future AWS employees undergo periodic medical reevaluations

by the EHU physician or other appropriate medical authority as a condition of continuing in AWS for health-related reasons, consistent with the medical documentation requirements of 5 C.F.R. Part 339.

Agency Comments


We did not obtain written agency comments on a draft of this report, but we met with senior officials representing EPA's personnel, safety and health, and facilities management staffs at the close of our work to discuss our findings and recommendations. During the course of that meeting, these officials agreed with our findings and recommendations. One official expressed his interest in having the development of the AWS policy done within the larger context of policy development work on the employment of handicapped persons in the agency. Another official said he felt that the AWS policy, which currently covers only EPA headquarters employees, should be expanded to cover EPA employees agencywide.

As agreed with the Subcommittee, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the date of the report. At that time, we will send copies to the Chairmen of the Senate and House Appropriations Committees; the Chairman, Senate Governmental Affairs Committee; the Chairman, House Post Office and Civil Service Committee; the Chairman, House Government Operations Committee; the Administrator, EPA; the Director, OPM; the Director, Office of Management and Budget; and others who may have an interest in this matter.

The major contributors to this report are listed in the appendix.

Please call me at (202) 275-5074 if you have any questions or require any additional information.

Sincerely yours,



Bernard L. Ungar
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